

Submission to the independent aviation safety regulation review panel: Alan Wilson

Name: Alan Ross Wilson

I have been a Glider pilot and a member of the GFA for more than 40 years. I have some 2,700 hours gliding and instructing, regularly fly more than 300 km in a single flight, and I hold a FAI Diamond badge meaning I have glided to 23,500'. I also hold glider maintenance authorisations.

I am also a current private pilot with 1,500 hours VFR experience. I have held a commercial pilot's license [REDACTED]. I have never held an instrument rating and now cannot use airports: I cannot justify the expense. I fly VFR out of paddocks.

I have also been involved as a professional engineer and bureaucrat in international programs at senior level and know international organisations often have rules appropriate to professional operations; rules that are seldom relevant to smaller organisations and interests. Bureaucrats find it easier to hide behind the skirts of higher organisations [i.e. ICAO dictums] than it is to change international organisations policies or advise local waivers that are in place.

I have thus been a member of the aviation community for 50 years, as a senior RAAF maintenance officer, an aviator, and a glider pilot.

I see that a thriving aviation sector that includes strong Sport aviation engagement is valuable to Australia, particularly as people skilled in the aviation sector will be a rare commodity in the near future. The gliding movement fosters these skills in the young and offers an avenue to maintain comparable skills throughout life. Australia will need that!

My core messages for the panel to consider include:

- The CASA role has a safety focus: at all costs. Dick Smith promoted 'affordable safety' and this would be a more appropriate function for CASA. Its charter should include the latter emphasis.
- I am not sure whether Part 149 Approved Organisation model is the best way forward. Applying ICAO top level policies to a largely volunteer organisation and operation is likely to place unnecessary and time consuming bureaucratic framework over an essentially uncomplicated gliding operation. For example Annex A shows that 98% of the Australian population is 'coastal' whereas most gliding operations are inland, well away from population centres. Gliding often involves simple reliable airframes that fly a maximum of two persons less than 500 and often even less than 100 hours per annum. Maintenance overheads that may be appropriate to complicated commercial airframes that fly perhaps 5,000 hours p.a. with a hundred passengers are an overkill for gliders. Gliding can be self regulated to a more appropriate level as the GFA has achieved for some 70 years.
- Funding and the method of fair audit of the GFA to an appropriate level requires ongoing consultation, but should note that a safe workable system [the GFA] has been in place for 70 years. The largely self-funded volunteer GFA organisation has achieved a sound system and outcome with modest compensation from public funds.
- GFA has had a cooperative relationship with CASA for at least 50 years [beginning with Geoff Strickland in the 1960's] and is held in high regard by aviation generally. The RAAF for example has a preference for pilots that have their roots in gliding. Many of recent starred rank officers started aviation in the gliding movement. The RAAF is creating gliding schools with some 20

gliders to cost effectively foster junior aviators. Commercial aviation conversely is showing signs of having button pushing pilots with poor raw aviation skills. [viz., the recent San Francisco major accident]

- I suggest there should be a preference for building on existing administration and oversight of gliding in Australia by the GFA, and not simply applying the letter of ICAO requirements. I am sure there are avenues to state waivers being applied in Australia, well outside and below commercial aviation air routes.
- Any punitive, authoritarian and disrespectful attitude currently demonstrated by the regulator is contrary to the aims of a vibrant, successful, diverse and thriving aviation sector. The level of administration applied by clerks rather than those with aviation expertise should be recognised. For example: aviation medical arrangements are unnecessarily punitive and gives no recognition of personal self regulation [viz., if I don't feel up to it, I won't fly]. GFA has a mechanism for monitoring medical condition, but gliding clubs oversight/witness every glider flight very closely.
- Do I really need a \$300 security card if I never fly into one of the 8 major airports? The ASIC has stifled much rural private aviation. If the security card were valid for 10 years maybe I could justify applying for the ASIC.
- Aviation at a recreational level is complicated by Knots for airspeed, and feet for altitude, measurement systems that have NOT been taught to Australian children for at least 30 years. And these units are complicated when compared to the metric system adopted worldwide with the one exception of the USA. Annex B is at least anecdotal evidence of the limit of the almost extinct imperial system. Gliders could fly metric: FAI tasks are already in kilometres. Glider flying and glide angles would be mentally easier if altitude, distance and speeds were metricated as they are in much of the gliding fraternity. A ministerial thrust of Australian aviation to ICAO should be to move to the metric system in aviation.

A Ministerial Policy is urgently needed directing CASA to adopt a core mission to support and promote:

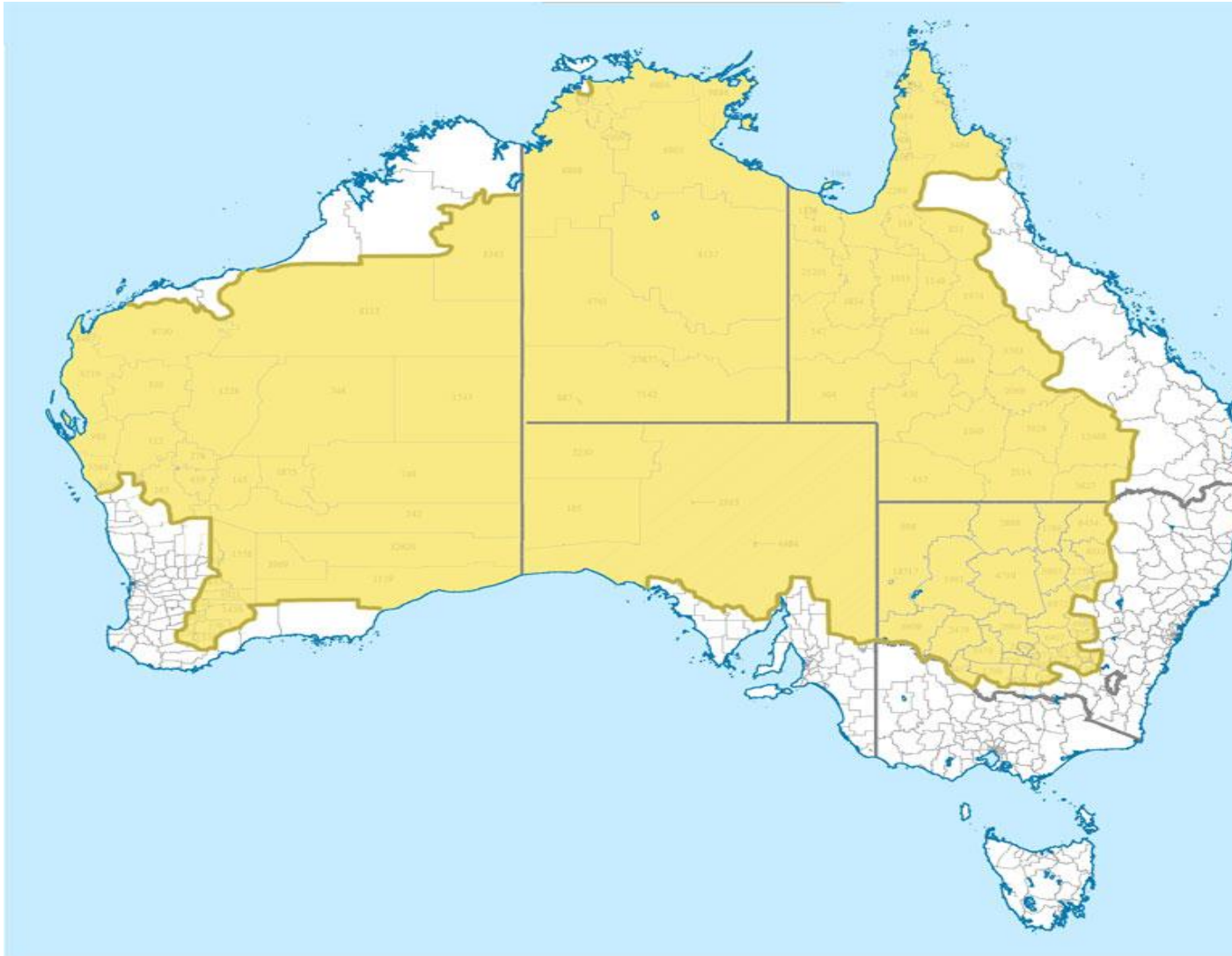
- Gliding in at least G airspace, and even higher levels of airspace.
- Private aviation with a simpler and cheaper ASIC: perhaps ASIC's should be current for 10 years.
- Considering the level to which ICAO standards should be applied and have a fundamental policy to advise ICAO that many bureaucratic professional policies will not be applied outside a 100 nautical mile radius of the eight major Australian cities and below 10,000 feet.
- The metrication of aviation worldwide. Aircraft currently fly in knots and feet whereas the greater majority of the world has adopted the metric standard. The objective should be that aviation be converted to the metric.
- Application of 'affordable safety' rather than the safety irrelevant of cost now in the CASA high level charter.

Thank you for your consideration and appreciation of the importance of the Gliding Federation of Australia in the sport and recreational aviation sector.

Alan Wilson
Wing Commander [RAAF Retired]

Annex A: Where 2% of Australia's Population Lives

Where 2% of Australia's Population Lives



Map by [e8odie on Reddit](#)

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Annex B: Countries That Do Not Use the Metric System



Map via [Wikimedia Commons](#)